



U.S. Department of Justice

*United States Attorney
Southern District of New York*

*86 Chambers Street
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June 1, 2021

BY ECF

The Honorable George B. Daniels
United States District Judge
Daniel Patrick Moynihan United States Courthouse
500 Pearl St.
New York, NY 10007

Re: *Cohan v. U.S. Dep't of Treasury*,
No. 20 Civ. 8900 (GBD)

Dear Judge Daniels:

This Office represents the United States Department of the Treasury ("Treasury" or "Defendant") in the above-referenced case brought by Plaintiff William D. Cohan ("Plaintiff"), pursuant to the Freedom of Information Act ("FOIA"), 5 U.S.C. § 552. On behalf of the parties, we write respectfully pursuant to the Court's order dated May 3, 2021, Dkt. No. 20, to provide a status report in advance of the initial pretrial conference scheduled for June 8, 2021.

On May 17, 2021, the date of the parties' last status report to the Court, Treasury made an additional production of non-exempt, responsive records resulting from the review over 500 pages of potentially responsive material. In addition, the parties concluded their discussions regarding Plaintiff's concerns about certain redactions in Treasury's productions to date, and the parties agree that there is nothing for the Court to resolve at this time.

The parties have conferred and continue to believe that it may ultimately be possible to resolve this matter without the need for judicial intervention, though the parties reserve the right to seek the assistance of the Court, as appropriate, should their respective views on this change. Accordingly, the parties respectfully request that the Court permit the parties to submit a further status report on July 9, 2021, advising the Court of the parties' progress on this matter. Treasury will continue to review and process records during this time.

Finally, undersigned counsel respectfully requests that, if the Court wishes to proceed with the conference scheduled for June 8, 2021, it be adjourned because of a previously scheduled conference that same morning before the Honorable Paul E. Davison. The parties are available the morning of June 10, or another time that is convenient for the Court.

Honorable George B. Daniels
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We thank the Court for its consideration of this request.

Respectfully submitted,

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